

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

Date: August 14, 1998

From: Irmee Huhn, OSC, Region II
Removal Action Branch

I Huhn

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START	

Subject: Pyridium Mercury Disposal Site No. 1 (Pyridium 1)
Village of Harriman, Orange County, New York

POLREP NO. Eleven (11)

II. BACKGROUND

Site No.: EV
Response Authority: CERCLA
NPL Status: Non-NPL
State Notification: NYSDOH notified
Action Memo Status: Signed 09/29/95, 9/25/97 and 3/6/98
Start Date: 1/9/95, 9/30/97, and 3/18/98
Demobilization Date: 4/5/95, 3/13/98, 8/5/98
Completion Date: 4/7/95, 3/13/98, 8/5/98

III. SITE INFORMATION

A. Incident Category: Illegal dump

B. Site Description

1. Site location

The Pyridium Mercury Disposal Site No. 1 (Pyridium 1) was a trailer park located at the intersection of State Route 17M and Harriman Heights Road in the Village of Harriman, Orange County, New York. Five mobile home trailers were located at the trailer park. All the trailers were occupied as residential dwellings.

A white clay-like material discovered at the trailer park, was used to fill low-lying areas of a wetland. This material was reportedly a waste product from the production of niacinamide by the Pyridium Corporation during the 1940's and 1950's. Nepera Inc. of Harriman, New York, currently occupies and operates the facility previously operated by the Pyridium Corporation.

B. Preliminary Assessment/Site Inspection Results

On October 20, 1994, the United States Environmental Protection Agency (EPA) collected a composite waste sample for waste characterization and mercury speciation. The sample was analyzed for Target Compound List (TCL) parameters, Target Analyte List (TAL) parameters and toxicity by the Toxicity Characteristic Leachate Procedure (TCLP).

Although the TCLP results are below regulatory limits, the TAL analytical results indicate the presence of mercury at an estimated concentration of 130 milligrams per kilogram (mg/kg). All the other compounds detected were below the New York State Department of Environmental Conservation (NYSDEC) recommended soil cleanup objectives.

Mercury speciation analytical results indicated that the sample contained no significant quantities of elemental mercury, mono-methyl mercury, or dimethyl mercury. When the sample was dissolved in an acid leach test, the mercury +2 ion leachate concentration was essentially the same as the total mercury concentration. Based on these results, the laboratory concluded that the sample was a chemical substrate contaminated with a mercuric or mercurous salt.

On November 17, 1994, the EPA Environmental Response Team (ERT) and the Response Engineering and Analytical Contractor (REAC) collected dust samples in each of the mobile homes at the trailer park. The analytical results of the dust sampling

indicated mercury concentrations ranging from 0.84 mg/kg to 26.8 mg/kg.

On November 28, 1994, Nepera, Inc. of Harriman, New York signed an Administrative Order on Consent (AOC) with EPA agreeing to fund relocation of the residents of the trailer park. Nepera has distributed relocation settlements to eligible residents. The amount of the settlement was based on federal relocation guidelines.

On January 9, 1995, verbal authorization was given by the EPA Director of the Emergency and Remedial Response Division to decontaminate, remove and dispose of the mobile homes, storage sheds and decks from the trailer park; disconnect water, sewer and electric utilities; remove heating oil and propane storage tanks; and fence the property and post warning signs. An Action Memorandum confirming verbal authorization was approved on February 27, 1996. For specific details refer to Polreps 1-3.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation

ERRS completed the restoration of the support area and demobilized the site on August 5, 1998.

2. Removal actions to date

On July 28, 1998, EPA and ERRS mobilized to site to restore the support area after the trailer was removed. The trailer was not demobed on July 27th as scheduled and reported by a local source. The restored area of the Site was watered and arrangements were made to remove the trailer and utility pole.

On August 5, after confirmation from the building inspector that the trailer and pole had been removed, EPA and ERRS mobilized to the site, restored the support area and demobilized the site. EPA and ERRS also watered the main site.

3. Enforcement

The Office of Regional Council is reviewing available site documentation to identify PRPs and will evaluate the viability of legal claims stated by Nepera.

B. Next Steps

Once the post excavation samples are validated, the report will be finalized.

C. Key Issues

None.

V. COST INFORMATION

The following are estimated costs for the removal action as of August 14, 1998:

	PROJECT CEILING	PREVIOUS COSTS	COSTS TO DATE	FUNDS REMAINING
ERRS (ERCS) Costs	\$1,028,400	\$102,000	\$692,900	\$233,500
START (TAT) Costs	\$ 81,400	\$ 19,700	\$ 37,600	\$ 24,100
Contingency	\$ 209,500			\$209,500
EPA Cost	\$ 107,000	\$ 24,200	\$ 43,900	\$ 38,900
TOTAL PROJECT CEILING	\$1,426,300	\$145,900	\$774,400	\$506,000

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure, which the EPA may include in any claims for cost recovery.

VI. DISPOSITION OF WASTE

Waste stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Non-hazardous soil, wood, PPE and debris	solid	5,995 tons	dump trailers/triaxle dump trucks	landfill	G.R.O.W.S. Landfill, Morrisville, PA
Non-hazardous soil, wood, PPE and debris	solid	665 tons	dump trailers/triaxle dump trucks	landfill	Tullytown Resource Recovery Facility, Tullytown, PA
Non-hazardous, non-DOT water contaminated with mercury	water	147,714 gallons	tanker truck	waste water treatment	Cycle Chem/Clean Venture Inc. Camden, NJ
Non-hazardous, non-DOT water contaminated with mercury	water	41,730 gallons	tanker truck	waste water treatment	Clean Harbors of Connecticut, Bristol, CT